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Plaintiffs' Class Counsel

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION

MDL No. 2843
Case No. 18-md-02843-VC

This document relates to:

ALL ACTIONS

**DECLARATION OF LESLEY E.
WEAVER IN SUPPORT OF
PLAINTIFFS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
EXHIBIT A IN SUPPORT OF JOINT
STATUS REPORT REGARDING
SETTLEMENT ADMINISTRATION
AND DISTRIBUTION**

Judge: Hon. Vince Chhabria
Courtroom: 4, 17th Floor

I, Lesley E. Weaver, declare and state as follows:

1. I am Partner-in-Charge of the California office of Bleichmar Fonti & Auld LLP, head of its consumer and antitrust practice, and Class Counsel to plaintiffs in *In re: Facebook, Inc. Consumer Privacy User Profile Litigation*, No. 18-md-02843-VC (N.D. Cal.). I am a member in good standing of the bar of the State of California and of the United States District Court for the Northern District of California.

2. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently to them.

3. This declaration is made in support of the Plaintiffs' Administrative Motion to File Under Seal Exhibit A in Support of Joint Status Report Regarding Settlement Administration and Distribution.

4. Specifically, Plaintiffs seek to seal:

	Document	Portions Sought to be Sealed
1	Exhibit A to the Class Counsel Declaration in Support of Joint Status Report Regarding Settlement Administration and Distribution	Entire document

5. The request to seal is narrowly tailored and seek to protect only material that describes the competitive and highly sensitive proprietary information regarding the bid responses from Plaintiffs' RFP process.

6. The non-party vendors who submitted the bids maintain this information as confidential in the ordinary course of business and have not made this information otherwise available to the public at large or to their competitors, and thus have a reasonable expectation of privacy in this information. Much of this information is crucial to the non-party vendors' commercial success, and is the sort of "sensitive, non-public, confidential, and proprietary business information" that courts routinely seal under the compelling reasons standard.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 14th day of August, 2025, in Oakland, California.

Dated: August 14, 2025

By: /s/ Lesley E. Weaver
Lesley E. Weaver